

REMARKS

Claims 37, 36-43 and 44-51 were rejected under 35 U.S.C. 112. In response claim 37 has been amended to obviate the rejection and claims 43-51 have been canceled without prejudice. Claims 31, 32, 34, 36, 38, 40, 42 43, and 52-55 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,275,695 (hereinafter "Green"). Claims 33 and 39 were rejected under 35 U.S.C. 103(a) as being unpatentable over Green in view of Stogel (U.S. Patent No. 5,483,579). Claims 35 and 41 were rejected under 35 U.S.C. 103(a) as being unpatentable over Green in view of Engelbeck (U.S. Patent No. 5,452,340). Claims 31-42 are in the application.

On the merits, Applicant respectfully submits that the pending claims, as amended, are patentable for at least the following reasons.

Independent claim 31 is directed to a control platform for use between a remote switching system and an on-site telephone system including at least one telephone, the platform comprising an interface connecting the platform directly to the on-site telephone system, a processor controlling a plurality of operational feature services or control access of the on-site telephone system in response to a plurality of operational commands, and a speech recognizer having a speech recognition input for receiving and recognizing voice input including the operational commands and

identifying the speaker associated with the voice input, and having an access list allowing the identified speaker to input those operational commands for which the speaker is authorized.

Green, as read by the applicants, relates to a system for verifying the identity of a call in a telecommunications network.

Green fails to teach, show or imply an interface connecting the platform directly to the on-site telephone system, a processor controlling a plurality of operational feature services or control access of the on-site telephone system in response to a plurality of operational commands, and a speech recognizer having a speech recognition input for receiving and recognizing voice input including the operational commands and identifying the speaker associated with the voice input, and having an access list allowing the identified speaker to input those operational commands for which the speaker is authorized, as specifically recited in claim 31. Independent claims 36 recites similar limitations.

The Examiner indicated that in Green, a "control platform" is shown in FIG. 1 item 28, "on-site telephone system", items 22 and 24, and "remote switching system", item 26. Applicants respectfully disagree. In col. 2, lines 36-60, Green teaches that control device 28 part of Network 12 and is operable to store retrievable voice templates, to receive and store spoken utterances of pass codes, to decode and compare spoken utterances. In other words,

Green teaches adding voice recognition to a switching network and not a control platform for use between a remote switching system and an on-site telephone system wherein operational feature services or control access of the on-site telephone system is controlled.

In FIG.1 of Green, Items 22, 24 and 26 are switches, and nothing has been found in Green to teach an on-site telephone system, and more importantly, that control device 28 can be used therewith. Again as noted above, nothing has been found in Green to suggest that control device 28 includes (with a processor or otherwise) controlling a plurality of operational feature services or control access of the on-site telephone system in response to a plurality of operational commands, as specifically recited in independent claim 31.

The MPEP section 2131 provides that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference. The identical invention must be shown in as complete detail as contained in the claim. Applicant submits that Green does not satisfy MPEP section 2131 as anticipatory references. Accordingly, withdrawal of the rejection is respectfully requested.

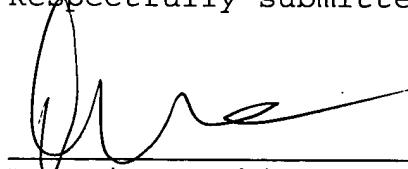
Accordingly, at least for these reasons, independent Claims 31 and 36 are believed to be patentable over the cited art.

The other claims in this application are each dependent from the independent claim discussed above and are, therefore, believed

allowable and patentable under 35 U.S.C. § 102 and 103 for the same reasons.

In view of the foregoing remarks, applicants respectfully request, favorable reconsideration and early passage to issue of the present application.

Respectfully submitted,



Dan Piotrowski
Registration No. 42,079
Senior Patent Counsel
(914) 333-9624

CERTIFICATE OF MAILING

It is hereby certified that this correspondence is being deposited with the United States Postal Service as first-class mail in an envelope addressed to:

COMMISSIONER OF PATENTS
Arlington, VA 22313-1450

On May 14, 2003
By Naem Chgpc